



August 31, 2023

**By ECF**

Hon. Katharine H. Parker, U.S. Magistrate Judge  
U.S. District Court for the Southern  
District of New York  
500 Pearl Street  
New York, NY 10007

Re: De Dios De Los Santos, et al. v. Shree Laxmi Restaurant, Inc., et al., Case No. 22-cv-10774  
Plaintiffs' Motion for Defendants' Production of Tax Returns Prior to the September 6,  
2023 Settlement Conference

Dear Judge Parker:

Catholic Migration Services, together with the Law Office of Robert D. McCreanor, PLLC, represent Plaintiffs Francisco De Dios De Los Santos and Luis Victoriano De Jesus in the above captioned matter. We write to request that the Court order the Defendants to produce their tax returns in advance of the Settlement Conference scheduled for September 6<sup>th</sup>.

During the July 26 Case Management Conference, the Court instructed the Defendants to produce their tax returns to Plaintiffs in advance of the September 6 settlement conference. As discussed at that time, the need for such disclosure is due to the Defendants' repeated insistence that they cannot afford to satisfy a judgment if the Plaintiffs prevail in this matter. To date, the Defendants have produced only corporate tax returns for 2020 and 2022. They have not produced the tax returns of the individual defendants Abishek Sharma and Lala Sharma. It is critical for Plaintiffs to understand the financial position of the individual defendants when considering whether to adjust their settlement demands. It is our understanding that one or both individual defendants own and operate three other restaurants and a catering business. The income from such ventures, and other possible income, is not included in the corporate tax returns of Defendant Shree Laxmi Restaurant, Inc.

Plaintiffs therefore respectfully request that Defendants be ordered to produce, not later than 5:00 PM on Tuesday September 5<sup>th</sup>: (1) the tax return of Shree Laxmi Restaurant, Inc. for 2021; (2) the tax returns of Defendant Abishek Sharma for 2020-2022; and (3) the tax returns of Defendant Lala Sharma for 2020-2022. A Protective Order is already in place in this matter. Doc. No. 33.

Having considered the positions of both Plaintiffs and Defendants, Defendants are **ORDERED** to produce the Restaurant's 2021 tax return as well as redacted versions of the Individual Defendants' tax returns for 2020-2022 by **5:00 p.m. today - September 5, 2023** - per the Court's direction at the July conference. The redactions shall protect sensitive information of the Individual Defendants, but must show their reported income, which is necessary for Plaintiffs and the Court to assess the fairness of any settlement amount that may be based on a compromise due to Defendants' purported inability to pay.

**SO ORDERED:**

*Katharine H. Parker*

HON. KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE

s Boulevard, Suite 203, Sunnyside, New York 11104 | (347) 472-3500 | catholicmigration.org  
9/5/2023